

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

STATE OF TEXAS,)
)
Plaintiff,)
)
VS.)
)
ERIC H. HOLDER, JR. in his)
official capacity as Attorney)
General of the United States,)
)
Defendant,)
)
ERIC KENNIE, et al.,)
)
Defendant-Intervenors,)
)
TEXAS STATE CONFERENCE OF) CASE NO. 1:12-CV-00128
NAACP BRANCHES,) (RMC-DST-RLW)
) Three-Judge Court
Defendant-Intervenors,)
)
TEXAS LEAGUE OF YOUNG VOTERS)
EDUCATION FUND, et al,)
)
Defendant-Intervenors,)
)
TEXAS LEGISLATIVE BLACK)
CAUCUS, et al,)
)
Defendant-Intervenors,)
)
VICTORIA RODRIGUEZ, et al.,)
)
Defendant-Intervenors.)

ORAL DEPOSITION OF
STATE OF TEXAS 30 (b) (6)
LEE GUYETTE
JUNE 19, 2012

2

1 ORAL DEPOSITION OF LEE GUYETTE, produced as a
2 witness at the instance of the Defendant, was duly
3 sworn, was taken in the above-styled and numbered cause
4 on the JUNE 19, 2012, from 3:13 p.m. to 6:09 p.m.,
5 before Chris Carpenter, CSR, in and for the State of
6 Texas, reported by machine shorthand, at the Offices of
7 the Texas Attorney General, 209 West 14th Street, 6th
8 Floor, Austin, TX 78701, pursuant to the Federal Rules
9 of Civil Procedure and the provisions stated on the
10 record or attached hereto.

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1 Richards, received copies of this analysis?

2 A. I see the intent of the e-mail, but I don't
3 know if it went beyond the group that you mentioned.

4 Q. Who is Coby?

5 A. That would be Deputy Secretary Coby Shorter,
6 Secretary of State.

7 Q. And the top of this e-mail, does Ms. McGeehan
8 state that she has attached a draft summary that she
9 will send to Coby and John so that they can distribute
10 to legislative folk?

11 A. That's correct. And to clarify, the John that
12 she's referencing is likely the John Sepehri, who was
13 general counsel.

14 Q. Okay. And to the extent of your knowledge, did
15 this distribution end with Coby and John?

16 A. To be honest with you, I don't even know if it
17 went to Coby and John. This is the extent of my
18 knowledge.

19 Q. Okay. All I can ask you for is the extent of
20 your knowledge.

21 A. That's...

22 Q. Now, if you can look back real quickly at
23 Exhibit 491. Do you see on Wednesday, January 26th, at
24 just before 4:00 p.m., Karen Richards sent out an e-mail
25 saying that some queries had already been done, some